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7 UNITED STATES BANKRUPTCY COURT
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 In re:

10 SOLEADOS ESTATES, LLC,
11 Debtor.

NO. 23-00196-WLH13

DECLARATION OF MATTHEW
GREEN

12 I, Matthew D. Green declare:

13 1. I am co-counsel for Spartan Business Solutions, LLC d/b/a Spartan Capital
14 (“Spartan”). I have been practicing law here in Washington for over 30 years, am in good
15 standing with the WA Bar, have personal knowledge of the matters herein, and am competent
16 to testify.

17 2. Domestication. In February 2023, our Firm was contacted by New York
18 attorney Jason Gang for the purpose of domesticating here in Washington, a judgment that had
19 been entered in a New York Court. The Judgment was entered in favor of Spartan against
20 Sullinair Jet Center, LLC; Soleados Estates, LLC; Pasco FBO Partners, LLC; ASI ES La Vida,
21 LLC; Capital Strategies & Developing, LLC; Rentafleet, LLC; and John A. Sullins
22 (collectively “Debtors”) in the sum of \$40,172.65. See Ex. A attached hereto.

23 3. On March 14, 2023, the Judgment was domesticated here in Washington, but as
24 set forth in the Judgment Summary filed with the Court, the judgment debtors did not include
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DECLARATION OF MATTHEW GREEN - I

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1 Debtors Sullinair Jet Center, LLC; and Pasco FBO Partners, LLC. since our Firm was made
2 aware that both LLCs had filed for respective bankruptcy protection and as such were covered
3 by the automatic bankruptcy stay. See Ex. B attached hereto.


4 4. At the time the Judgment was domesticated here in WA, our Firm had no
5 knowledge that Debtor Soleados Estates, LLC had recently filed for bankruptcy protection. In
6 fact, it was not until I received a copy of opposing counsel's pleadings and Motion that I first
7 become aware that Soleados Estates, LLC had in fact filed for bankruptcy protection on
8 February 17, 2023.

9 5. Upon learning of Soleados Estates, LLC's bankruptcy filing, our Firm
10 immediately communicated this fact to opposing counsel Patrick McBurney (See Ex. C
11 attached hereto); and filed the requisite pleadings with the Court to amend the domestication of
12 the Judgment so that it also does not identify as a judgment debtor Soleados Estates, LLC (See
13 Ex. D attached hereto).

14 6. To date, the only action taken to enforce the Judgment was to cause a Writ of
15 Garnishment to be issued to Numerica CU, along with a record subpoena. Numerica CU's
16 answer to the Writ states that no monies have been garnished. See Ex. E attached hereto. The
17 records produced under the subpoena were only for accounts held under John A. Sullins;
18 Capital Strategies & Developing, LLC; ASI ES La Vida, LLC; and Rentafleet, LLC. NO
19 records for any accounts held by Soleados Estates, LLC; Sullinair Jet Center, LLC; and/or
20 Pasco FBO Partners, LLC were produced.

21 The foregoing statement is made under penalty of perjury under the laws of the State of
22 Washington and is true and correct.

23 Signed at Seattle, Washington, this 25 day of April, 2023.

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Matthew D. Green, WSBA # 18046

DECLARATION OF MATTHEW GREEN - 2

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